

Brian E. Frosh, Attorney General  
Brian T. Edmunds, Assistant Attorney General  
Office of the Attorney General of Maryland  
200 Saint Paul Place  
Baltimore, Maryland 21202  
bedmunds@oag.state.md.us  
(410) 567-6578

*Attorneys for the State of Maryland*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

---

<b>In re:</b>	)	Chapter 11
	)	
<b>PURDUE PHARMA, L.P., et al.,</b>	)	Case No. 19-23649 (RDD)
	)	
<b>Debtors.</b>	)	(Jointly Administered)
	)	
	)	

---

**STATE OF MARYLAND'S STATEMENT OF ISSUES  
AND DESIGNATIONS OF RECORD ON APPEAL**

Pursuant to Rule 8009 of the Federal Rules of Bankruptcy Procedure, Appellant, the State of Maryland, ("Maryland") hereby files its statement of issues on appeal and designations of record. *See Amended Notice of Appeal of the State of Maryland to Confirmation Order and All Related or Merged Orders (Sept. 29, 2021) (D/N 3839); Notice of Appeal of Confirmation Order (Sept. 15, 2021) (D/N 3780).*

**I. Incorporation of Other Appellants'  
Statements of Issues and Designations of Record**

Maryland incorporates by reference as if fully set forth herein all issues issues and designations of record submitted by other appellants, as set forth in:

D/N	Title
3842	Appellant, United States Trustee's, Statement of Issues and Designation of Items for Record on Appeal of Confirmation Order and Order Approving Disclosure Statement

D/N	Title
3843	Appellant, United States Trustee's, Statement of Issues and Designation of Items for Record on Appeal of Advanced Funding Order
3863	The State of Washington's, State of Connecticut's, and District of Columbia's Statement of the Issues to be Presented and Items to be Included in the Record on Appeal
3882	The State of Oregon's Statement of the Issues to be Presented and Items to be Included in the Record on Appeal

**II. Additional Issues on Appeal:**

Maryland also will present the following additional issues on appeal:

1. Whether the bankruptcy court erred in confirming the Twelfth Amended Joint Plan of Reorganization (“Plan”) because the plan’s non-consensual releases of the State of Maryland’s police power claims against non-debtors exceed or violate (a) the Bankruptcy Clause, (b) principles of Federalism enshrined in the Constitution, (c) principles of the Separation of Powers, (d) the Tenth Amendment, (e) the bankruptcy court’s subject-matter jurisdiction, (f) the scope of relief permitted by the Bankruptcy Code (including, but not limited to, 11 U.S.C. §§ 105(a), 362(b)(4), 523, and 524(e), 1129), (g) the non-debtor releases permitted by judicial precedent, and (h) the requirement that the plan be fair and equitable to creditors.

2. Whether the bankruptcy court erred in admitting the (a) Declaration [D/N 3421] and testimony of Lawrence A. Hamermesh, including the exhibits, and (b) the exhibits to Paragraph 33 of the Declaration of John S. Dubel [D/N 3433].

3. Whether the Bankruptcy Court’s findings of fact and conclusions of law, including the findings in its Modified Bench Ruling, regarding the non-debtor releases, the circumstances that would exist absent the inclusion of a channeling injunction against and non-debtor releases of state police power claims and other claims in the Plan, and the recoverability and collectability of judgments against non-debtors are supported by substantial evidence and not clearly erroneous.

4. Whether the bankruptcy court erred in assuming jurisdiction over state police power claims and then preliminarily enjoining state government-initiated police power investigations and litigation.

5. Whether the Plan impermissibly requires the States to submit to judicial prior approval of certain police power activities related to non-debtors released by the Plan.

### **III. Additional Designations for Record on Appeal**

In addition to those designated by other parties, Maryland hereby designates the following items to be included in the record on appeal.

<b>ID</b>	<b>Title</b>
D/N 6	Motion to Authorize/Motion of Debtors for Entry of an Order Authorizing (I) Debtors to (A) Pay Pre-Petition Wages, Salaries, Employee Benefits and Other Compensation and (B) Maintain Employee Benefits Programs and Pay Related Administrative Obligations, (II) Employees and Retirees to Proceed with Outstanding Workers' Compensation Claims and (III) Financial Institutions to Honor and Process Related Checks and Transfers.
D/N 62	Interim Order
D/N 74	Complaint in adversary case no. 19-08289, <i>Purdue Pharma, et al v. Commonwealth of Massachusetts, et al.</i>
D/N 324	Transcript, 9/17/2019 Hearing
D/N 134	United States Trustee's Objection to Motion For Order Authorizing (I) Debtors to (A) Pay Pre-Petition Wages, Salaries, Employee Benefits and Other Compensation and (B) Maintain Employee Benefit Programs and Pay Related Administrative Obligations, (II) Employee and Retirees to Proceed with Outstanding Workers' Compensation Claims and (III) Financial Institutions to Honor and Process Related Checks and Transfers
D/N 196	Commonwealth of Pennsylvania's Objection to Motion and Joinder to United States Trustee's Objection
D/N 197	Objection to Motion / Joinder/Objection by the Ad Hoc Group of Non-Consenting States
D/N 235	Debtors' Omnibus Reply in Support of Motion to Authorize / Motion of Debtors for Entry of an Order Authorizing (I) Debtors to (A) Pay Pre-Petition Wages, Salaries, Employee Benefits and Other Compensation and (B) Maintain Employee Benefits Programs and Pay Related Administrative Obligations, (II) Employees and Retirees to Proceed with Outstanding Workers' Compensation Claims and (III) Financial Institutions to Honor and Process Related Checks and Transfers.
D/N 236	Supplemental Declaration of John Lowne

ID	Title
D/N 256	Notice of Proposed Order /Notice of Filing of Revised Proposed Final Order Authorizing (I) Debtors to (A) Pay Prepetition Wages, Salaries, Employee Benefits and Other Compensation and (B) Maintain Employee Benefits Programs and Pay Related Administrative Obligations, (II) Employees and Retirees to Proceed with Outstanding Workers
D/N 257	Notice of Filing of Term Sheet with Ad Hoc Committee
D/N 291	Statement / Notice of Filing of Case Stipulation among the Debtors, the Official Committee of Unsecured Creditors and Certain Related Parties
D/N 299	Letter from Pennsylvania Governor Tom Wolf
D/N 309	Order Granting Motion Authorizing (1) Debtors to (A) Pay Prepetition Wages, Salaries, Employee Benefits and Other Compensation and (B) Maintain Employee Benefits Programs and Pay Related Administrative Obligations, (II) Employees and Retirees to Proceed with Outstanding Workers' Compensation Claims and; (III) Financial Institutions to Honor and Process Related Checks and Transfers
D/N 325	Transcript of Hearing, October 10, 2019
D/N 330	<i>Statement // Statement of the Official Committee of Unsecured Creditors of Purdue Pharma L.P., et al. Regarding the Case Stipulation among the Debtors, the Official Committee of Unsecured Creditors and Certain Related Parties</i>
D/N 415	Motion to Approve Motion of the Official Committee of Unsecured Creditors of Purdue Pharma L.P., et al. for Entry of an Order Clarifying the Requirement to Provide Access to Confidential or Privileged Information and Approving a Protocol Regarding Creditor Requests for Information
D/N 430	Notice of Presentment of Amended Case Stipulation
D/N 518	Amended and Restated Case Stipulation signed on 11/20/2019 Among the Debtors, the Official Committee of Unsecured Creditors and Certain Related Parties
D/N 550	Transcript of November 19, 2019 Hearing
D/N 554	Second Supplemental Declaration of John Lowne
D/N 556	Motion of Debtors for Entry of an Order Authorizing (I) Debtors to (A) Pay Pre-Petition Wages, Salaries, Employee Benefits and Other Compensation and (B) Maintain Employee Benefits Programs and Pay Related Administrative Obligations, (II) Employees and Retirees to Proceed with Outstanding Workers' Compensation Claims and (III) Financial Institutions to Honor and Process Related Checks and Transfers
D/N 557	Statement of the Ad-Hoc Group of Non-Consenting States Maintaining Its Objection
D/N 559	State of Maryland's Additional Statement With Respect to the Payment of Bonuses Under Debtors' Wage Motion to Any Recipient Who Participated in Debtors' Unlawful Conduct
D/N 629	Supplemental Final Order Authorizing (I) Debtors to (A) Pay Pre-Petition Wages, Salaries, Employee Benefits and Other Compensation and (B) Maintain Employee Benefits Programs and Pay Related Administrative Obligations, (II) Employees and Retirees to Proceed with Outstanding

ID	Title
	Workers' Compensation Claims and (III) Financial Institutions to Honor and Process Related Checks and Transfers
D/N 630	States' Notice of Public Health Information
D/N 657	Transcript of Hearing, December 4, 2019
D/N 682	Notice of Filing of Redacted Version of the Raymond Sackler Family's Presentation of December 6, 2019
D/N 685	Motion to Make Publicly Available the Raymond Sackler Family's Presentation of December 6, 2019
D/N 692	Motion for an Order Pursuant to Section 107(b) of the Bankruptcy Code and Bankruptcy Rule 9018 Authorizing the Filing Under Seal of Certain Parts of the Presentation to the Official Committee of Unsecured Creditors
D/N 694	Notice of Withdrawal
D/N 695	Notice of Withdrawal
D/N 697	Notice of Withdrawal
D/N 699	Order Granting Motion to Clarify Protocol
D/N 710	Letter to Judge Drain in Support of Massachusetts Attorney General Healey's decision to reject the settlement offer
D/N 702	December 19, 2019 Hearing Transcript
D/N 729	Notice of Presentment of Protective Order
D/N 758	Debtors' Second Supplemental Reply
D/N 768	Ad-Hoc Group of Non-Consenting States' Continuing Objection to Wage Motion
D/N 783	Second Supplemental Final Order Authorizing Debtors to Pay Certain Prepetition Wages & Etc.
D/N 784	Protective Order
D/N 829	Motion for Authorization to Enter Into Development Agreement
D/N 830	Declaration of John Lowne
D/N 849	Statement of the Official Committee of Unsecured Creditors Regarding Debtors' Motion for Authorization to Enter Into Development Agreement
D/N 850	Statement on Behalf of the Ad Hoc Group of Non-Consenting States
D/N 858	Notice of Filing Revised Proposed Order Authorizing Entry Into Development Agreement
D/N 868	Order Shortening Time & Authorizing Entry Into Development Agreement
D/N 901	Notice of Presentment of Amended Protective Order
D/N 962	Amended Protective Order
D/N 974	March 18, 2020 Hearing Transcript
D/N 1420	Notice of Presentment of Second Amended Protective Order
D/N 1540	Second Amended Protective Order
D/N 1865	Notice of Presentment of Third Amended Protective Order
D/N 1935	Third Amended Protective Order
D/N 2749	West Virginia Objection to Disclosure Statement
D/N 2762	Objection of Ad Hoc Group of Non-Consenting States the Debtors' Motion to Approve the Adequacy of Information in the Disclosure Statement

ID	Title
JX-0384	Deposition of Professor Lawrence A. Hamermesh, taken in this case on July 15, 2021
JX-0409	Expert Report of Michael Cushing, dated June 15, 2021
JX-1589	Cushing Deposition Exhibit 2
JX-1672	Purdue Quarterly Report to the Board 2nd Quarter 2012
JX-1673	12/15/1998 Email of Kathe Sackler
JX-1674	Russell Gasdia Email of 10/28/13
JX-1675	David Rosen Email 7/8/13
JX-1676	Dr. Richard Sackler email of 1/3/2001
JX-1677	Dr. Richard Sackler email of 4/8/2001
JX-1678	Dr. Richard Sackler email of 9/1/2008 (11:06 a.m.)
JX-1679	7/22/2010 Board of Directors Meeting Agenda - July 20 Draft
JX-1680	Dr. Richard Sackler email of 9/1/2008 (9:03 a.m.)
JX-1681	Steven Gruenwald email of 12/8/2017
JX-1682	Clyde Williams email of 8/10/2017
JX-1683	OxyContin 2016 Strategy Plan
JX-1684	2010 Budget Presentation Notes and Actions
JX-1685	Email of John Stewart
JX-1686	Email of Richard Sackler
JX-1687	Email of Edward Mahoney
JX-1688	Board of Directors meeting agenda 1/30/18
JX-1689	Board of Directors meeting agenda 3/8/2018
JX-1693	Commercial Budget Meeting presentation draft
JX-1694	Email from Richard Sackler to David Rosen and Russell Gasdia
JX-1695	2008 Rx Factory Forecast
JX-1696	Email from Amir Levin to Richard Sackler, Mortimer Sackler,
JX-1697	Email from Ilene Sackler Lefcourt to Richard Sackler
JX-1698	Email from David Sackler to Richard Sackler, John Stewart, and Jonathan Sackler
JX-1700	"Product C Profile"
JX-1701	Email from Richard Sackler to John Stewart
JX-1702	Email from Mark Timney to Richard Sackler
JX-1703	Email from Jonathan Sackler to Richard Sackler, David Sackler
JX-1704	"Draft Message to the Board"
JX-1705	Email from Jonathan Sackler To Richard Sackler
JX-1706	Email from Ilene Sackler Lefcourt to Josephine Martin
JX-1707	Email from Ilene Sackler Lefcourt to Josephine Martin
JX-1708	Email from Richard Sackler to Josephine Martin
JX-1709	Email from Jonathan Sackler to Jon Stewart, Ake Winstrom, David Haddox, Karen Reimer, Craig Landau

ID	Title
JX-1710	Email from Amy Grandison to Beverly Sackler, Theresa Sackler, Richard Sackler, Ilene Sackler Lefcourt, Kathe Sackler, Jonathan Sackler, Mortimer Sackler, David Sackler, Peter Boer, Cecil Pickett, Paulo Costa, Jacques Theurillat, Maria Barton, Anthony Roncalli, Stuart Baker, Craig Landau
JX-1711	"Purdue Pharma Telling our Story: 2018"
JX-1712	Mundipharma US/ROW Technical Operations, Project Optimal Update Week of June 4, 2018
JX-1713	Powerpoint Slides beginning w/ "Cumulative Reductions from FTEs from 2013"
JX-1714	"Executive Compensation Recommendations"
JX-1715	Email from Ilene Sackler Lefcourt to Alberto Martinez
JX-1716	Email from Ilene Sackler Lefcourt to Josephine Martin
JX-1717	Email from Ilene Sackler Lefcourt to Samantha Sackler Hunt, Mariss Sackler, Sophie Dalyrymple, Michael Sackler, David Sackler
JX-1718	Email from Ilene Sackler Lefcourt to Mortimer Sackler
JX-1719	Email from Ilene Sackler Lefcourt to Jonathan Sackler
JX-1720	Email from David Haddox to Richard Sackler, John Stewart, Anthony Santopio
JX-1721	Draft Presentation re OxyContin ADF Roll Out
JX-1722	Email from Mark Timney to David Sackler
JX-1723	Email from J Sackler to David Sackler
JX-1724	Email from Taylor Lefcourt to Ilene Sackler Lefcourt
JX-1725	Email from Ilene Sackler Lefcourt to Samantha Sackler Hunt, Mariss Sackler, Sophie Dalyrymple, Michael Sackler, David Sackler
JX-1726	Email from Richard Sackler to David Sackler and Ralph Snyderman
JX-1727	Deposition of Kathe Sackler 4/1/2019
JX-1728	Deposition of Russell Gasdia 1/15/2019
JX-1729	Deposition of Richard Sackler 7/25/2002
JX-1730	Deposition of Russell Gasdia 6/27/2008
JX-1731	Deposition of Robert Kaiko 11/28/2018
JX-1732	Deposition of Stuart Baker
JX-1733	Russell Gasdia email 4/12/12
JX-1735	5/21/2019 Examination of James Gill
JX-1736	Judge for Yourselves
JX-1737	Judge for Yourselves
JX-1738	Judge for Yourselves
JX-1739	Judge for Yourselves
JX-1740	Judge for Yourselves
JX-1741	Judge for Yourselves
JX-1742	Judge for Yourselves
JX-1743	Judge for Yourselves
JX-1744	Judge for Yourselves
JX-1745	Judge for Yourselves

ID	Title
JX-1746	Judge for Yourselves
JX-1747	Judge for Yourselves
JX-1748	Judge for Yourselves
JX-1749	Judge for Yourselves
JX-1750	Examination of Ceanethia Rogers
JX-1753	Amended Statement of Charges, <i>CPD vs Purdue et al.</i>
JX-1754	Response and Affirmative Defenses of Purdue Pharma et al, and all exhibits thereto, Consumer Protection Division, Office of the Attorney General v. Purdue Pharma et al.
JX-1755	Response and Affirmative Defenses of Rhodes, and all exhibits thereto, Consumer Protection Division, Office of the Attorney General v. Purdue Pharma et al.
JX-1757	Proponent's response in opposition to motion to continue administrative hearing, and all exhibits thereto, Consumer Protection Division, Office of the Attorney General v. Purdue Pharma et al.
JX-1758	Administrative subpoena issued to Richard Sackler, Johnathan Sackler, Mortimer Sackler, Ilene Sackler Lefcourt, Beverly Sackler, Theresa Sackler,
JX-2094	DOJ--Purdue Plea Agreement with Exhibits and Addenda
JX-2096	DOJ--Sackler Settlement with Addenda
JX-2710	Consumer Protection Division, Office of the Attorney General v. Purdue Pharma et al., Sackler Motion to Dismiss
JX-2711	Consumer Protection Division, Office of the Attorney General v. Purdue Pharma et al., Sackler Motion to Dismiss, D. Sackler Decl.
JX-2712	Consumer Protection Division, Office of the Attorney General v. Purdue Pharma et al., Sackler Motion to Dismiss, I. Sackler Decl.
JX-2713	Consumer Protection Division, Office of the Attorney General v. Purdue Pharma et al., Sackler Motion to Dismiss, J. Sackler Decl.
JX-2714	Consumer Protection Division, Office of the Attorney General v. Purdue Pharma et al., Sackler Motion to Dismiss, K. Sackler Decl.
JX-2715	Consumer Protection Division, Office of the Attorney General v. Purdue Pharma et al., Sackler Motion to Dismiss, M. Maxman Decl. and Exs.
JX-2716	Consumer Protection Division, Office of the Attorney General v. Purdue Pharma et al., Sackler Motion to Dismiss, M. Sackler Decl.
JX-2717	Consumer Protection Division, Office of the Attorney General v. Purdue Pharma et al., Sackler Motion to Dismiss, R. Sackler Decl.
JX-2718	Consumer Protection Division, Office of the Attorney General v. Purdue Pharma et al., Sackler Motion to Dismiss, T. Sackler Decl.
JX-2719	Consumer Protection Division, Office of the Attorney General v. Purdue Pharma et al., Sackler Motion to Stay
JX-2720	Consumer Protection Division, Office of the Attorney General v. Purdue Pharma et al., Sackler Motion to Stay, M. Maxman Decl.
JX-2721	Consumer Protection Division, Office of the Attorney General v. Purdue Pharma et al., Sackler Motion to Stay, Exhibits
JX-2757	MkKinsey Presentation "OxyContin Growth Opportunities"

ID	Title
JX-2758	Email of Bert Weinstein
JX-2759	Collection of Mundipharma websites
JX-2760	Response and Affirmative Defenses of the Individual Former Directors, and all exhibits thereto, Consumer Protection Division, Office of the Attorney General v. Purdue Pharma et al.
JX-2874	Letter re: Purdue Pharma, L.P., et al., CPD Case No. 19-023-311366, OAH Case No. 1923474
JX-2875	Letter re: Purdue Pharma, L.P., et al., CPD Case No. 19-023-311366, OAH Case No. 1923474
JX-2876	Joint Status Report, Consumer Protection Division, Office of the Attorney General v. Purdue Pharma et al.
JX-2877	Exhibit A, Purdue Pharma LP. Voluntary Petition for Non-Individuals Filing for Bankruptcy
JX-2878	Exhibit A, In re Purdue Pharma L.P., Order Pursuant to 11 U.S.C. 105(a) Granting In Part, Motion For a Preliminary Injunction
JX-2879	Exhibit A, Complaint, North Dakota v. Purdue Pharma L.P, No. 08-2018-CV-01300
JX-2880	Exhibit 1, Mayor and City Council of Baltimore v. Purdue Pharma L.P., No. 24-V-18-000515
JX-2881	Insys Therapeutics' John Kapoor, The India-Born Billionaire Bribed Doctors with Cash, Strip Clubs, On Trial
JX-2882	Letter re: Consumer Protection Division v. Purdue Pharma L.P., CPD Case No. 19-023-311366, OAH Case No. 1923474
JX-2883	Letter re: Purdue Pharma, L.P., et al., CPD Case No. 19-023-311366, OAH Case No. 1923474
JX-2884	Letter to Honorable Judge Thibodeau
JX-2885	Respondents' Prehearing Conference Memorandum
JX-2886	Joint Status Report, Consumer Protection Division, Office of the Attorney General v. Purdue Pharma et al.
JX-2887	Joint Status Report, Consumer Protection Division, Office of the Attorney General v. Purdue Pharma et al.
JX-2888	Letter re: Consumer Protection Division v. Purdue Pharma L.P., CPD Case No. 19-023-311366, OAH Case No. 1923474
JX-2889	Letter re: Administrative Subpoena
JX-2890	Notice of Suggestion of Bankruptcy and Automatic Stay of Proceedings, Consumer Protection Division v. Purdue Pharma L.P., CPD Case No. 19-023-311366, OAH Case No. 1923474
JX-2891	Respondent's Bench Memorandum, Consumer Protection Division v. Purdue Pharma L.P., CPD Case No. 19-023-311366, OAH Case No. 1923474
JX-2892	Letter re: Purdue Pharma, L.P., et al., CPD Case No. 19-023-311366, OAH Case No. 1923474
JX-2893	Letter re: Purdue Pharma, L.P., et al., CPD Case No. 19-023-311366, OAH Case No. 1923474

ID	Title
JX-2894	Respondents' Prehearing Statement, Consumer Protection Division v. Purdue Pharma L.P., CPD Case No. 19-023-311366, OAH Case No. 1923474
JX-2895	Letter re: Respondents' Status Report Regarding Identification of Out-of-State Counsel and Status of Their Application for Special Admission Pro Hac Vice, Consumer Protection Division v. Purdue Pharma L.P., CPD Case No. 19-023-311366, OAH Case No. 1923474
JX-2896	Supplement to General Order
JX-2905	B-Side Defense Presentation
JX-2952	Email from Richard Sackler "The discoveries of McKinsey are astonishing"
JX-3097	Email from Richard Sackler ("I agree with you")
JX-3098	Email from Robert Kaiko ("it will eventually be abused")
JX-3099	Email from Richard Sackler ("Performance Enhancing Agents")
JX-3100	Email from Richard Sackler
JX-3101	Email from Mortimer D. Sackler
JX-3103	Email from Richard Sackler ("hammer on the abusers")
JX-3104	Email and attached memo from Richard Sackler ("Purdue's situation is unique, particularly in its dangerous concentration of risk")
JX-3105	Email from Jonathan Sackler
JX-3109	Board presentation by Russell Gasdia
JX-3111	Board agenda
JX-3112	Email from Todd Baumgartner
JX-3113	Email from Russell Gasdia
JX-3114	Sales & Marketing presentation
JX-3115	Email from Stuart Baker
JX-3118	Executive Operating Committee presentation
JX-3119	Email from Stuart Baker
JX-3120	Executive Committee presentation
JX-3121	Email from Stuart Baker
JX-3122	Draft - Board of Directors Meetings (U.S. Companies) Agenda for 6/09/2016 Meetings
JX-3123	Email from Gail Cawkwell
JX-3124	Email from Craig Landau (2008 National Sales Meeting)
JX-3125	Emails from Richard Sackler (opioid savings cards)
JX-3126	Email from Richard Sackler
JX-3127	Email from John Stewart
JX-3128	Email from Russell Gasdia
JX-3129	Email from Russell Gasdia ("third weekend in a row where Dr. Richard has people running around")
JX-3130	Email from David Rosen
JX-3131	Emails from David Rosen and John Stewart
JX-3132	Email from Kathe Sackler
JX-3133	Email from Richard Sackler ("status of covered lives now with OxyContin?")
JX-3134	Email from John Stewart

ID	Title
JX-3135	Email from Mortimer Sackler ("I really don't understand why you would forecast for Oxycontin to start declining")
JX-3136	Emails from Robert Barmore and David Rosen
JX-3137	Email from John Stewart
JX-3138	Email from Mike Innaurato
JX-3139	Emails from Richard Sackler and Mike Innaurato
JX-3140	Email from Richard Sackler
JX-3141	Email from Kathe Sackler
JX-3142	Email from Sharon Salwan ("driven by lower demand for OxyContin 40mg and 80mg strengths")
JX-3143	Email from Richard Sackler
JX-3144	Email from Russell Gasdia
JX-3145	Email from Richard Sackler
JX-3146	Email from Russell Gasdia
JX-3147	Email from Richard Sackler
JX-3148	Email from Richard Sackler
JX-3149	Email from Richard Sackler
JX-3150	Email from Russell Gasdia
JX-3151	Email from John Stewart
JX-3152	Email from Russell Gasdia
JX-3154	Email from Russell Gasdia ("RS going to field with reps ... potential compliance risk")
JX-3155	Email from Russell Gasdia
JX-3156	Email from Bert Weinstein ("Richard wanted to go into the field ...could be out on a limb")
JX-3157	Attachment to email from Ed Mahoney
JX-3158	Email from Russell Gasdia
JX-3159	Email from John Stewart ("under budget sale are due to lower than projected demand - particularly the 80mg & 40mg strengths")
JX-3160	Email from Richard Sackler
JX-3161	Email from John Stewart
JX-3162	Email from Jonathan Sackler
JX-3164	Email from Russell Gasdia
JX-3165	Email from Russell Gasdia
JX-3167	Email from Russell Gasdia
JX-3168	Email from David Rosen
JX-3169	Email from Russell Gasdia ("I can't impress upon you enough the significant concerns at the Board level as well as senior management with regards to the OxyContin sales trends")
JX-3170	Email from Richard Sackler
JX-3171	Email from Russell Gasdia ("Anything you can do to reduce the direct contact of Richard")

ID	Title
JX-3172	Email from Russell Gasdia ("continued erosion of the 40mg and 80mg strengths")
JX-3173	Email from Edward Mahony ("non-tax distributions of \$418.2 million")
JX-3174	Email from Richard Sackler
JX-3175	Email from Russell Gasdia ("Patients can be titrated 'on us'")
JX-3176	Email from Richard Sackler ("Can you get me a spreadsheet with the following ... Rx's should be normalized for strength")
JX-3177	Presentation
JX-3178	Email from David Rosen
JX-3180	Email from Richard Sackler
JX-3181	Email from David Rosen
JX-3182	Email from John Stewart
JX-3183	Mid year Board meeting agenda
JX-3184	Email from Paulo Costa
JX-3185	Email from Russell Gasdia
JX-3187	Email from Mike Innaurato
JX-3191	Emails from Russell Gasdia and Robert Barmore
JX-3192	Email from Russell Gasdia
JX-3193	Email from John Stewart
JX-3194	Email from William Mallin
JX-3197	Email from Russell Gasdia
JX-3198	Email from John Stewart
JX-3199	Email from John Stewart
JX-3200	Email from John Stewart
JX-3201	Email from John Stewart
JX-3202	Presentation by John Stewart and Russell Gasdia
JX-3203	Memo from McKinsey ("take actions to 'Turbocharge Purdue's Sales Engine'")
JX-3204	Email from John Stewart
JX-3205	Email from David Rosen
JX-3206	Budget presentation
JX-3207	Email from John Stewart
JX-3208	Evolve to Excellence Presentation by Mark Timney
JX-3209	Email from Mark Timney
JX-3210	Email from Mark Timney
JX-3211	Email from Edward Mahony
JX-3212	Email from Edward Mahony
JX-3213	Email from McKinsey
JX-3214	Email from Russell Gasdia
JX-3215	Emails from Mortimer Sackler, Richard Sackler, and John Stewart
JX-3221	Email from Edward Mahoney
JX-3222	Email from Edward Mahoney

ID	Title
JX-3223	Email from Richard Sackler
JX-3224	Email from Craig Landau
JX-3225	Email from Jon Lowne
JX-3226	Email from Craig Landau
JX-3227	Email from Michael Friedman
JX-3228	Email from Mike Innaurato
JX-3229	Email from Robert Josephson
JX-3230	Email from Richard Sackler
JX-3231	Email from Burt Rosen ("I spoke to Richard just before the year end and raised concerns over our internal documents.")
JX-3232	Email from Kathe Sackler
JX-3233	Presentation by Craig Landau
JX-3234	Email from Richard Sackler
JX-3235	Email from Richard Sackler
JX-3236	Emails from Richard Sackler
JX-3239	Email from Richard Sackler
JX-3240	Communications Strategy Recommendations Presentations
JX-3241	Email from Richard Sackler
JX-3242	Email from Raul Damas
JX-3243	Email from Richard Sackler
JX-3244	Email from Richard Sackler
JX-3245	Email from Robert Barmore about Richard Sackler ("Notice the generous 5 min time period between the request and the reminder email")
JX-3246	Email from John Stewart
JX-3247	Email from Mike Innaurato
JX-3249	Email from Richard Sackler
JX-3251	Email from William Mallin
JX-3254	Email from John Stewart
JX-3256	Email from Richard Sackler
JX-3257	Email from Richard Sackler ("they get themselves addicted")
JX-3258	Email from Richard Sackler ("I think the idea of comparing PET scans of addict sand pain patients is very interesting.")
JX-3259	Email from Richard Sackler ("Abusers aren't victims; they are victimizers.")
JX-3263	Email from Richard Sackler ("please send me the excel spreadsheets...")
JX-3264	Email from Michael Friedman ("We have tried to keep the family out of the press.")
JX-3265	Board agenda
JX-3266	Email from Stuart Baker to Members of the Board
JX-3267	Emails from Mortimer Sackler, Jonathan Sackler, and Richard Sackler ("Seems like the organization has just fully given up and is resigned to declining volume sales for all our products which bodes really badly for our business")
JX-3268	Emails from Mortimer Sackler, Jonathan Sackler, and Richard Sackler

ID	Title
JX-3275	Deposition of Theresa Sackler
JX-3278	MDS Family Charter (Oct. 1, 2013)
JX-3281	Calendar of MDS Family Meetings
JX-3282	Email from Geraldine McNaney to Mortimer Sackler of July 10, 2008
JX-3285	MDS Trust Memorandum (Aug. 29, 2002)
JX-3286	Family Council Meeting
JX-3282	Email from Geraldine McNaney to Mortimer Sackler of July 10, 2008
JX-3288	Email from Richard Sackler to Ake Wikstrom <i>et al.</i> of July 3, 2009
JX-3289	Email from David Sackler to Richard Sackler of Dec. 31, 2009
JX-3289	Draft Agenda, March 1, 2011, Purdue Board of Directors
JX-3290	Email from Ilene Sackler Lefcourt to Jörg Fisher of July 12, 2012
JX-3291	Email from Ilene Sackler Lefcourt to Stuart Baker of July 19, 2012
JX-3292	Agenda, Board of Directors meeting, March 23, 2013
JX-3293	Beneficiaries Meeting
JX-3294	Filling in Gaps: A Scan for Opportunities to Respond to the Opioid Crisis
JX-3295	Email from Richard Sackler to Mortimer Sackler of Aug. 13, 2017
JX-3296	Email from Ilene Sackler Lefcourt to Jack Stein of Nov. 22, 2017
JX-3297	Supervisory Council
JX-3298	Transcript of Deposition of Ilene Sackler Lefcourt (Sept. 18, 2020)
JX-3299	Declaration of Ilene Sackler Lefcourt & Errata Sheet (Nov. 3, 2020)
No. 19-08289, 291	Twenty-Second Amended Preliminary Injunction

Dated: October 5, 2021  
Baltimore, Maryland

Respectfully Submitted

BRIAN E. FROSH  
Attorney General of Maryland

/s/ Brian T. Edmunds  
BRIAN T. EDMUNDS  
Assistant Attorney General

Office of the Attorney General of Maryland  
200 Saint Paul Place  
Baltimore, Maryland 21202  
[bedmunds@oag.state.md.us](mailto:bedmunds@oag.state.md.us)  
(410) 576-6578

*Attorneys for the State of Maryland*